Domtar Industries Inc.	**)**	**Department**
Washington County	**)**	**Findings of Fact and Order**
Baileyville Maine	**)**	**Part 70 Air Emission License**
A-215-70-A-I	**)**	

After review of the Initial Part 70 License application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, Section 344 and Section 590, the Department finds the following facts:

I. Registration

A. Introduction

FACILITY	Domtar Industries Inc., Woodland Mill
LICENSE NUMBER	A-215-70-A-I
LICENSE TYPE	Initial Part 70 License
NAICS CODES	32211, 32212
NATURE OF BUSINESS	Pulp and Paper
FACILITY LOCATION	Baileyville, Maine
DATE OF LICENSE ISSUANCE	December 22, 2004
LICENSE EXPIRATION DATE	December 22, 2009

B. Emission Equipment

The following emission units are addressed by this Part 70 License:

Emission Unit ID	**Unit Capacity**	**Primary Fuels/Raw Materials/Gas Streams**
Power Boiler #9	740 MMBtu/hr	#6 fuel oil, <2.5% Sulfur Biomass Sludge Tire Derived Fuel Specification Waste Oil HVLC-High Vol., Low Conc. Gases LVHC-Low Vol., High Conc. Gases General Mill Yard Waste Oily Rags, Absorbent Material Stripper Off Gas Propane
#3 Recovery Boiler	1207 MMBtu/hr	Black Liquor #6 Fuel Oil, Propane
Package Boiler	≤ 77.3 MMBtu/hr	#2 Fuel Oil, Diesel Fuel
Smelt Dissolving Tank	N/A	Smelt, Weak Wash, and Fresh Water

Continuous Kamyr Digester	N/A	Wood Chips
Multiple Effect Evaporator System	N/A	Weak Black Liquor
Brownstock Washer System	N/A	Brownstock Pulp
Pressure Diffusion Washer System	N/A	Brownstock Pulp
Black Liquor Storage System	N/A	Weak and Strong Black Liquor
Bleach Plant/Chlorine Dioxide Generation System	N/A	Unbleached Pulp, ClO_2, NaOH, O_2, Hydrogen Peroxide
R_8/R_{10} ClO_2 Generation Plant	N/A	Methanol, Sodium Chlorate, Sulfuric Acid
Lime Slaker (large)	N/A	Green Liquor, Lime (CaO), Weak Wash
Lime Slaker (small)	N/A	Green Liquor, Lime (CaO), Weak Wash, Water
Lime Kiln	N/A	Calcium Carbonate Slurry, (Lime Mud)
Lime Kiln	75 MMBtu/hr	#6 Fuel Oil, Propane
#4 Paper Machine	N/A	Bleached HW Pulp, Bleached SW Pulp, Additive Materials
Starch Silo	N/A	Starch
Fresh Lime Silo	N/A	Lime (CaO)
Reburned Lime Silo	N/A	Reburned Lime
Pulp Dryer	N/A	Bleached Pulp Slurry
Chip Thickness Screening Dust Collection System	N/A	Wood Dust
Old Screen Room Dust Collection System/Rotatory Drum Screen	N/A	Wood Dust
Condensate Steam Stripper	N/A	Foul Condensate
Incinerator	20 MMBtu/hr	NCG (Non-Condensable Gases), Stripper Off-gas, Propane
#6 Fuel Oil Storage System	2,100,000 gal	#6 Fuel Oil
#6 Fuel Oil Storage System (Fmr. Low Sulfur Oil Storage Tank)	374,000 gal	#6 Fuel Oil
Methanol Storage Tank	19,600 gal	Methanol
Propane Storage Tank	18,000 gal	Propane

The descriptions above are nominal capacities and do not represent limits. Production capacities within the Findings of Fact of this License are referenced for the purposes of description only. Capacities that are determined to be a specific licensed limit are listed as such within the Order section of this License.

Domtar has additional insignificant activities which do not need to be listed in the emission equipment table above. The list of insignificant activities can be found in the Part 70 license application and in Appendix B of Chapter 140 of the Department's Regulations.

C. Application Classification

The application for Domtar does not include the licensing of increased emissions or the installation of new or modified equipment, therefore the license is considered to be an Initial Part 70 License issued under Chapter 140 of the Department's regulations for a Part 70 source.

II. EMISSION UNIT DESCRIPTION

A. Process Description

Domtar's Woodland Pulp and Paper facility is a semi-integrated pulp and paper mill, which utilizes the Kraft Pulping process and produces pulp and uncoated fine papers. Wood chips are delivered from the adjacent Fulghum Fibers chipping facility as well as brought to the mill via trucks. Wood chips are unloaded and then screened in the woodyard. Acceptable chips are then fed into a steaming vessel, which purges air from the chips. The chips and white liquor are then fed into the digester, which subjects the chips to high temperature and pressure alkaline cooking in order to dissolve the lignin that holds the fibers together. After leaving the digester, softened chips are fed to a flash tank where they are subjected to a pressure drop, allowing the wood fibers to be separated from the now dissolved lignin. The fibers are then sent to the Pressure Diffusion Washer and the Brownstock Washing System in the form of brownstock pulp where residual liquor is removed from the pulp and spent chemicals are recovered. The washed brownstock pulp is then sent through brownstock storage and then to the bleaching process. The bleaching process utilizes several bleaching stages. The bleached pulp is then sent to both the pulp dryer and the paper machine. Some paper is sheeted on site, some is shipped as rolls, and pulp is shipped in bales.

The residual black liquor from the digester undergoes a series of concentration steps via evaporation, after which it is burned in the #3 Recovery Boiler. The resulting smelt from the Recovery Boiler is dissolved in weak wash or water in the Smelt Dissolving Tank, where it forms green liquor. The green liquor is then reacted with lime to form white liquor, which is used again in the digester thus completing the "liquor cycle".

The Mill also operates support facilities including woodyards, wastewater treatment plant, sludge press, pulp and paper production labs, environmental labs, finishing/shipping/receiving operations, storage areas, a landfill, and a power boiler .

B. 40 CFR Part 63, Subpart S (Pulp and Paper MACT)

Domtar is subject to Subpart S due to the facility's kraft pulping processes and the use of wood as a raw material.

a. LVHC System (Low Volume High Concentration)
In accordance with 40 CFR, §63.443 Domtar captures and controls Hazardous Air Pollutants (HAP's) from the LVHC system, which includes the digester, steam stripper, and evaporator systems. The LVHC system gases are incinerated in the #9 Power Boiler or the NCG Incinerator.

b. HVLC System (High Volume Low Concentration)
In accordance with 40 CFR Part 63, Subpart S, Domtar is required to capture and control HAP's from the HVLC system, which includes the brown stock washers. The HVLC control system will consist of collection and incineration in the #9 Power Boiler. The compliance date for equipment listed in 40 CFR, Part 63.443(a)(1)(ii)-(v), which includes pulp washing systems (i.e. the brownstock washer systems), and knotter, screen, and decker systems is April 17, 2006. This deadline has been extended to April 17, 2007, pursuant to the provisions in 40 CFR, 63.6(i).

c. Condensate Collection System
Domtar has elected to demonstrate compliance with the pulping condensate collection option listed in 40 CFR Part 63, §63.446(c)(3), which requires collection of pulping process condensates that contain a total HAP mass rate of 11.1 lb/ton of oven-dry pulp.

Domtar is using a steam stripper to treat some of the pulping process condensate streams and sending the captured HAP's to either the #9 Power Boiler or the NCG Incinerator. The treatment of these condensate streams meets the requirements of 40 CFR, 63.446(e)(3), reducing or destroying the total HAPS by 92%, or 63.446(e)(5), removing 10.2 lb of HAPs per ton of oven-dry pulp, or achieving a total HAP concentration of 330 ppm or less at the outlet.

C. Chapter 124, Total Reduced Sulfur Control From Kraft Pulp Mills
Chapter 124 of the Department's regulations requires control of TRS compounds from various pulping processes and condensate systems at the facility. In some instances, these control requirements overlap with the control requirements for HAPs per 40 CFR Part 63, Subpart S.

Chapter 124 requires the use of the current LVHC system to control TRS from the digester system, evaporator systems, and the steam stripper. The LVHC system is controlled by the #9 Power Boiler or the NCG Incinerator. Chapter 124 requires the use of an HVLC system to control TRS from the brownstock washer systems. The Thickener (Decker) wash water has been replaced from clean combined condensate to fresh hot water, thus eliminating the need for collection and control of these gases. Compliance with Chapter 124 requires that the collection and

control system for TRS emissions from the brownstock washers at Domtar must be in place by April 17, 2007.

D. #9 Power Boiler

The #9 Power Boiler was manufactured by Babcock & Wilcox with a nominal design heat input of 740 MMBtu/hr except as follows: The boiler has a licensed heat input of 625 MMBtu/hr on a 24-hr basis. The boiler may fire up to 740 MMBtu/hr when #3 Recovery Boiler is offline or in a period of startup or shutdown, and the pulp mill, and the pulp dryer all are operating. The #9 Power Boiler is licensed to fire #6 Fuel Oil, biomass (including wood chips, bark, wood waste, waste paper, cardboard, cores, and sludge), TDF (Tire Derived Fuel), specification waste oil, LVHC and HVLC system gases, Stripper Off-gases, general mill yard waste, oily rags and absorbent materials. The boiler was installed in 1971, prior to the New Source Performance Standards (NSPS) subpart D or Db applicability dates. A wet scrubber was installed on the boiler in 1979. The boiler is used to supply energy to the manufacturing process. Emissions exit through a 225 ft Above Ground Level (AGL) stack. The #9 Power Boiler is considered "in operation" if any fuel is being combusted in the boiler.

Streamlining

1. Opacity
   MEDEP Chapter 101, Section 2(B)(1) and Section 3 contain the only applicable Opacity standard for the #9 Power Boiler Stack.
   No streamlining is required.

2. Particulate Matter (PM)
   a. Domtar accepts streamlining for PM requirements. MEDEP Chapter 103, section 2(A)(3)(b) is applicable to the #9 Power Boiler. The previously established RACT limit of 0.15 lb PM/MMBtu, found in License #A-215-71-B-A/R, is more stringent than Chapter 103. Domtar has accepted streamlining for PM lb/MMBtu to the current RACT emission limit or 40 CFR, Part 63, Subpart DDDDD, whichever is the more stringent standard, once the emission limits of Subpart DDDDD come into effect.

   b. BPT establishes the only applicable PM lb/hr emission limit.
      No streamlining is required.

3. PM_{10}
   BPT establishes the only applicable PM_{10} lb/hr emission limit.
   No streamlining is required.

4. Sulfur Dioxide
   a. Domtar accepts streamlining for sulfur dioxide requirements. MEDEP Chapter 106, section 4(B) (Flue Gas Desulfurization) is applicable for #9 Power Boiler. The BPT limit of 0.79 lb SO_2/MMBtu is more stringent than Chapter 106. Therefore, only the more stringent BPT sulfur dioxide limit is included in this license.
   b. BPT establishes the only applicable SO_2 lb/hr emission limit.
      No streamlining is required.

5. NO_X
   a. A NO_X RACT emission limit of 0.40 lb/MMBtu applies pursuant to MEDEP Chapter 138 section 4(3), and the emission averaging provisions in section 3(1).
      No streamlining is required
   b. BPT establishes the only applicable NO_X lb/hr emission limits (see Conditions 14 and 16). **No streamlining is required**

6. CO
   a. BPT establishes the only applicable CO lb/MMBtu emission limits (firing oil only, firing "other fuel", see Condition 14).
      No streamlining is required
   b. BPT establishes the only applicable CO lb/hr emission limit.
      No streamlining is required

7. Volatile Organic Compounds (VOC)
   a. BPT establishes the only applicable VOC lb/MMBtu emission limits (firing oil only, firing "other fuel", see Condition 14).
      No streamlining is required.
   b. BPT establishes the only applicable VOC lb/hr emission limit.
      No streamlining is required.

Periodic Monitors

Until the CMS for Subpart DDDDD is installed, operational and data verified pursuant to 40 CFR, Part 63.8(c)(3), periodic monitoring for the #9 Power Boiler shall consist of the following:

Items to be Monitored	**Record**	**Average**
Scrubber Pressure Drop	Every 15 min	3 hr avg every three hours
Scrubber media make-up flow	Every 15 min	3 hr avg every three hours
Scrubber media recycle flow	Every 15 min	3 hr avg every three hours

Domtar shall test the #9 Power Boiler for PM every calendar year in accordance with 40 CFR, Part 60, Appendix A, Method 5. Once the requirements of 40 CFR, Part 63, Subpart DDDDD are met, the frequency of PM stack testing may be reevaluated.

Based on best management practices and the type of fuel for which #9 Power Boiler was designed, it is unlikely that #9 Power Boiler will exceed the emission limits for CO and VOC. Therefore, periodic monitoring by the source for these pollutants is not required. However, neither the EPA nor the State is precluded from requesting the Mill to perform testing and may take enforcement action for any violation discovered.

Parameter Monitors
There are no parameter monitors required for the #9 Power Boiler.

CEMS
Continuous Emission Monitoring Systems, subject to MEDEP Chapter 117, for #9 Power Boiler, shall be operated for SO_2, NO_X, and O_2 on a ppm basis, and stack flow on a cfm basis.

Control Equipment
Particulate Matter and SO_2 emissions from the #9 Power Boiler are controlled through the use of a mulitclone and a variable-throat wet venturi scrubber.

E. #3 Recovery Boiler

The #3 Recovery Boiler is a Gotaverken single drum boiler nominally rated at 1207 MMBtu/hr. The unit was manufactured and installed in 1988, has fifteen burners, and fires black liquor (4 burners) and #6 fuel oil (11 burners). Each burner can utilize a propane igniter. Installation of the #3 Recovery Boiler (and Smelt Tank) was permitted pursuant to Prevention of Significant Deterioration (PSD) permitting requirements. When firing oil, the boiler is subject to NSPS, 40 CFR Part 60, Subpart Db for steam generating units greater than 100 MMBtu/hr and manufactured after June 19th, 1984. The #3 Recovery Boiler is not subject to 40 CFR, Part 60, Subpart D or the NO_X limits of 40 CFR, Part 60, Subpart Db because the annual capacity factor for oil is limited to less than 10%. The #3 Recovery Boiler is also subject to 40 CFR, Part 60, Subpart A, General NSPS Provisions; Subpart BB, NSPS for Kraft Mills; and 40 CFR, Part 63, Subpart MM, NESHAP for Chemical Recovery at Kraft Pulp Mills.

The #3 Recovery Boiler is capable of firing black liquor (from the Digester System as well as imported black liquor) either alone or in combination with #6 fuel oil. The #6 fuel oil is used to start the combustion of black liquor, and to stabilize the black liquor firing. The boiler is equipped with a dry ESP manufactured by ABB Flakt to control PM emissions.

The #3 Recovery Boiler is considered "in operation" if any fuel is being combusted in the boiler.

Streamlining

1. Opacity
   Domtar accepts streamlining for opacity requirements. MEDEP Chapter 101, Section 2(B)(2) and 40 CFR, Part 60, Subpart BB requirements are applicable. Only the more stringent Chapter 101 requirements are included in this license.

2. PM and PM_{10}
   a. Domtar accepts streamlining for the PM requirement. MEDEP Chapter 105, Section 2 and previously established LAER limits are applicable. Domtar was subject to LAER (Lowest Achievable Emission Rate) in 1989. 40 CFR, Part 63, Subpart MM took effect March 13, 2004. The LAER PM limit is more stringent than the PM requirement put forth in Subpart MM. Only the more stringent LAER requirement is included in this license.
   b. LAER establishes the only applicable PM and PM_{10} lb/hr emission limits. **No streamlining is required.**

3. Sulfur Dioxide
   a. Domtar accepts streamlining for SO_2 requirements. Domtar was subject to BACT in 1989. MEDEP Chapter 106 and 40 CFR, Part 60, subsection Db, 60.42b are applicable. SO_2 requirements for this license are split between a combination of the most stringent requirements of each rule. Domtar shall either fire low sulfur fuel oil (most stringent part of MEDEP Chapter 106), or shall meet an alternative lb/MMBtu limit (most stringent part of 60.42b).
   b. To operate more efficiently during startup and shutdown, an alternative SO_2 limit has been put into effect that allows a combined emission limit for #3 Recovery Boiler and #9 Power Boiler of 793.04 lb SO_2/hr on a 3-hour block average basis. This limit can be used for no more than 300 hours per calendar year.

4. NO_X
   a. MEDEP Chapter 138, Section 3(C) contains the only applicable NO_X ppm (24 hr block average) emission standard. The MEDEP Chapter 138 (NO_X RACT) standard is on a wet basis. The limit contained in this license is the equivalent of that standard converted to a dry basis. **No streamlining is required.**
   b. BACT (License A-215-71-B-A/R) establishes the only applicable NO_X lb/hr and ppm (30 day rolling average) emission limits (see Conditions 15 and 16). **No streamlining is required.**

5. CO
   a. Domtar was subject to BACT in 1989. BACT establishes the only applicable CO ppmv emission limit.
      No streamlining is required.
   b. BACT establishes the only applicable CO lb/hr emission limit.
      No streamlining is required.

6. VOC
   a. BACT establishes the only applicable VOC lb/hr emission limit.
      No streamlining is required.

7. Total Reduced Sulfur (TRS)
   Domtar accepts streamlining for TRS. MEDEP Chapter 124, Section 3(H) and 5(c)(3)(a) and 40 CFR, section 60.283(a)(2) and 60.284(e)(1)(i) contain applicable TRS ppm emission limits. Only the more stringent MEDEP Chapter 124(3)(H) and (5)(c)(3)(a) limits are included in this License.

Periodic Monitoring

Periodic monitoring shall consist of record keeping that includes fuel use records and fuel analysis records. Periodic monitoring for #3 Recovery Boiler shall also consist of the following:

Item to be monitored	**Record**
Black liquor firing rate	24-hr average

Domtar shall stack test the #3 Recovery Boiler every two calendar years for PM in accordance with 40 CFR, Part 60, Appendix A, Method 5

Based on best management practices and the type of fuel for which #3 Recovery Boiler was designed, it is unlikely that #3 Recovery Boiler will exceed the emission limits for VOC. Therefore, periodic monitoring by the source for this pollutant is not required. However, neither the EPA nor the State is precluded from requesting the Mill to perform testing and may take enforcement action for any violation discovered.

Parameter Monitors

There are no parameter monitors required for the #3 Recovery Boiler.

MACT CMS

MACT, 40 CFR, Part 63, Subpart MM contains an applicable requirement to operate a COMS to monitor opacity from the #3 Recovery Boiler. The MACT CMS shall be installed, operational, and data verified pursuant to 40 CFR, Part 63.8(c)(3). Pursuant to its existing air emission license, Domtar must operate a COMS to monitor opacity from the No. 3 Recovery Boiler. The COMS must be installed and operated in accordance with the requirements in MEDEP Chapter 117. In addition, Domtar is required to operate the COMS to monitor opacity from the No. 3 Recovery Boiler pursuant to 40 C.F.R. Part 63, Subpart MM. As required by 40 C.F.R. Parts 63, Subparts A and MM, Domtar conducted an initial performance evaluation on the COMS within 180 days of the Subpart MM compliance date of March 13, 2004. Domtar may utilize the same COMS for demonstrating compliance with the existing opacity limit in Condition 15(N) of this license and the opacity limit set forth in 40 C.F.R. Part 63, Subpart MM.

CEMS and COMS

a. Air Emission License A-215-71-B-A/R contains an applicable requirement to monitor percent Opacity, SO_2 ppm, NO_X ppm, O_2 ppm, and TRS ppm emissions.
b. MEDEP Chapter 138 contains an applicable requirement to monitor NO_X ppm emissions.
c. MEDEP Chapter 124 contains an applicable requirement to monitor TRS ppm emissions.
d. 40 CFR, Part 60, Subpart BB contains an applicable requirement to monitor TRS ppm emissions.
e. BPT establishes an applicable requirement to monitor CO ppm emissions.
f. All CEMS and COMS listed above shall be operated in accordance with MEDEP Chapter 117.

Based on the above, Domtar shall operate a CEMS which provides data to calculate NO_X (lb/hr, ppm), SO_2 (lb/hr, ppm), O_2 ppm, and TRS ppm emissions from #3 Recovery Boiler. BPT establishes that Domtar shall operate a CEMS to monitor CO ppm emissions from #3 Recovery Boiler. Domtar shall operate a COMS to monitor opacity from the #3 Recovery Boiler.

Control Equipment

Control Equipment for the #3 Recovery Boiler consists of operating an ESP for particulate emissions control.

F. Smelt Dissolving Tank

The Smelt Dissolving Tank was installed in 1988 in conjunction with the installation of the #3 Recovery Boiler, and began operating in August 1989. During the combustion of black liquor in the #3 Recovery Boiler, the heating value of the lignin is released and the cooking chemicals are recovered as smelt or

molten sodium salts referred as salt cake. The liquid smelt is extracted from the bottom of the boiler, and dissolved in water or weak wash in the smelt dissolving tank to form green liquor.

Particulate emissions and TRS from the Smelt Dissolving Tank are controlled by a Ducon dynamic fan wet scrubber, which uses weak wash or fresh water as the scrubbing medium. The Smelt Dissolving Tank is subject to MEDEP Chapter 124, as well as NSPS, 40 CFR, Part 60, Subpart BB for Kraft Smelt Tanks manufactured after September 24th, 1976. Subpart BB and MEDEP Chapter 124 each require TRS (Total Reduced Sulfur) emissions to meet a limit of 0.033 lb/ton of Black Liquor Solids (BLS) as H_2S, and Subpart BB requires PM emissions to meet a limit of 0.20 lb/ton of BLS (dry weight). The Smelt Dissolving Tank is also subject to 40 CFR, Part 63, Subpart MM, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Chemical recovery Combustion Sources at Kraft Pulp Mills.

The Smelt Dissolving Tank is considered "operating" or "in operation" if any smelt is being drained into the dissolving tank on a sustained basis.

Streamlining

1. PM and PM_{10}
   a. Domtar accepts streamlining for Particulate Matter requirements. The Smelt Dissolving Tank is subject to MEDEP Chapter 105, as well as 40 CFR, Part 60, Subpart BB and Part 63, Subpart MM. Subpart BB requires PM emissions to meet a limit of 0.20 lb/ton of BLS (dry weight). Subpart MM required that the concentration of PM in the exhaust gases discharged to the atmosphere meet a standard of 0.20 lb/ton of BLS fired. However, the LAER applied in 1989 requires the Smelt Dissolving Tank to meet a more stringent PM limit of 0.127 lb/ton of BLS (dry weight). Only the more stringent LAER standard is listed in this license.
   b. BACT establishes the only applicable PM and PM_{10} lb/hr emission limits. **No streamlining is required.**

2. SO_2
   BACT establishes the only applicable SO_2 lb/hr emission limit.
   No streamlining is required.

3. TRS
   MEDEP Chapter 124, Section 3(J) and 40 CFR, section 63.283(a)(4) contain identical TRS ppm emission standards. **No streamlining is required.**

Periodic monitoring

Domtar shall stack test the Smelt Dissolving Tank every two calendar years for PM in accordance with 40 CFR, Part 60, Appendix A, Method 5, and every two calendar years for TRS in accordance with 40 CFR, Part 60, Appendix A.

MACT CMS
MACT, 40 CFR, Part 63, Subpart MM contains an applicable requirement to operate a CMS for the Smelt Tank Scrubber.

The MACT CMS for the Smelt Tank Scrubber shall consist of the following in accordance with Subpart MM. The MACT CMS shall be installed, operational, and data verified pursuant to 40 CFR, Part 60.8(c)(3):

Item to be monitored	**Record**	**Average**
Scrubber media flowrate	Every 15 min	3 hr block avg once every 3 hours
Scrubber pressure drop	Every 15 min	3 hr block avg once every 3 hours

The CMS parameter range shall be determined or modified as necessary, according to the procedures as specified in 40 CFR, Part 63.453(n)."

CEMS and COMS
There are no CEMS or COMS required to be operated for the Smelt Dissolving Tank.

Control Equipment
The Smelt Dissolving Tank is equipped with a Ducon dynamic fan wet scrubber to control particulate emissions. The scrubber uses weak wash as the scrubbing media.

G. Portable Package Boiler
The Portable Package Boiler is used for back-up steam production when the #9 Power Boiler is off-line. Based on modeling reported in Air Emission License #A-215-71-E-A, the Portable Package Boiler can have a maximum heat input rating of 77.3 MMBtu/hr and must fire #2 fuel oil or Diesel Fuel. The Package Boiler shall not operate when the #9 Power Boiler is on-line. For the purposes of this license, "on-line" shall be defined as producing steam for production or heating use by the Mill. The Portable Package Boiler shall be limited to less than six weeks of operation per calendar year.

The Portable Package Boiler fires #2 fuel oil with a sulfur content not to exceed 0.25% by weight. Use of the Package Boiler shall be limited to 6 weeks per calendar year. Domtar must maintain documentation sufficient to demonstrate compliance with this restriction. PM and PM_{10}, NOx, SO_2, CO, and VOC

emission rates are based on BACT emission factors. The Portable Package Boiler may be subject to 40 CFR, Part 60, Subparts A and Dc.

The Portable Package Boiler is located at a major source of Hazardous Air Pollutants (HAPs) and is therefore subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR, Part 63, Subpart DDDDD). However, there are no requirements in Subpart DDDDD that apply to the Portable Package Boiler while firing #2 fuel oil.

Package Boiler has already been licensed pursuant to Maine's minor NSR provisions. Provided the Package Boiler meets the requirements in this license, including restriction of operation to less than 6 weeks per year and size restrictions on the boiler, temporary installation and use of the package boiler will not be subject to additional minor or major NSR licensing requirements under Chapter 115 or 40 C.F.R. Part 51.

Streamlining

1. Opacity
   MEDEP Chapter 101 establishes an applicable visible emission standard. In addition, 40 CFR, Part 60, Subpart Dc establishes an applicable visible emission standard if the boiler is subject to Subpart Dc. BACT establishes that the Subpart Dc standard is the more stringent standard and shall be used in this License regardless of whether the Portable Package Boiler is subject to Subpart Dc.

2. PM and PM_{10}
   a. MEDEP Chapter 103 and BACT establish identical PM lb/MMBtu emission standard.
   b. BACT establishes the only applicable PM lb/hr emission limit.
      No streamlining is required.
   c. BACT establishes the only applicable PM_{10} lb/hr emission limit.
      No streamlining is required.

3. SO_2
   A BACT emission limit was established for SO_2 in Air Emission License # A-215-71-E-A, and is the only applicable SO_2 lb/hr emission limit included in this License. **No streamlining is required.**

4. NO_X
   A BACT emission limit was established for NO_X in Air Emission License # A-215-71-E-A, and is the only applicable NO_X lb/hr emission limit included in this License. **No streamlining is required.**

5. CO
   A BACT emission limit was established for CO in Air Emission License # A-215-71-E-A, and is the only applicable CO lb/hr emission limit included in this License. **No streamlining is required.**

6. VOC
   A BACT emission limit was established for VOC in Air Emission License # A-215-71-E-A, and is the only applicable VOC lb/hr emission limit included in this License. **No streamlining is required.**

Periodic Monitoring

Periodic Monitoring shall consist of record keeping which demonstrates fuel use and firing rate of the Portable Package Boiler and delivery receipts or other records from the supplier indicating the percent sulfur by weight of the fuel oil.

Based on best management practices and the type of fuel for which the Portable Package Boiler was designed, it is unlikely that it will exceed emission limits for PM, SO_2, NO_X, CO, VOC, and Opacity. Therefore periodic monitoring by the source for these pollutants is not required. However, neither the EPA nor the State is precluded from requesting Domtar to perform testing, and may take enforcement action for any violations discovered.

Parameter Monitors

There are no Parameter Monitors required for the Portable Package Boiler.

CEMS and COMS

There are no CEMS or COMS required to be operated for the Portable Package Boiler.

Control Equipment

None

H. Digester and Multiple Effect Evaporation System (MEE)

The Digester and Evaporation Systems consists of a continuous Kamyr (now Ahlstrom) digester and two multiple effect evaporator trains. The evaporator systems are used to increase the percent solids of the spent cooking liquor from the digester. The Digester and Evaporator Systems generate non-condensable gases (NCGs) and VOCs, which are collected and vented to the #9 Power Boiler or the backup NCG incinerator for incineration. The Digester system does not include the chip bin for purposes of MEDEP Chapter 124 or 40 CFR, Part 63, Subpart S, because only fresh steam is used in the chip bin.

The Digester and Evaporator systems are subject to 40 CFR, Part 63, Subpart S for Pulp and Paper Manufacturers. They are not subject to 40 CFR, Part 60, Subpart BB for Kraft Digesters as it was installed in 1965, prior to the

applicability date of September 24th, 1976. The control of VOC emissions from the Digester system by incineration in the #9 Power Boiler or the NCG incinerator complies with MEDEP Chapter 124, and is therefore determined to be meeting VOC RACT.

Streamlining

1. TRS
   MEDEP Chapter 124 contains the only applicable TRS emission standards.
   No streamlining is required.

2. VOC
   This source is subject to and has been evaluated for VOC RACT per MEDEP Chapter 134. **No streamlining is required.**

3. HAPs
   40 CFR, Part 63, Subpart S contains the only applicable HAP standard.
   No streamlining is required.

I. Brownstock Washer System

The Brownstock Washer System washes the cooked pulp from the digester in order to remove the residual liquor that would contaminate the pulp during subsequent processing steps and recover the maximum amount of spent chemicals with minimum dilution.

The Brownstock Washer System is subject to the requirements of 40 CFR, Part 63, Subpart S. It is not subject to 40 CFR, Part 60, Subpart BB since it was installed in 1965, prior to the applicability date of September 24th, 1976, and has not since been modified or reconstructed.

The Brownstock Washer System includes a Pressure Diffusion Washer that was installed in 1996 and is subject to 40 CFR, Part 63, Subpart S. The Pressure Diffusion Washer is not subject to 40 CFR, Part 60, Subpart BB because "diffusion washers" are excluded from the definition of "brownstock washers" for the purposes of that subpart.

Streamlining

1. TRS
   MEDEP Chapter 124 contains the only applicable TRS emission limit.
   No streamlining is required

2. VOC
   This source is subject to and has been evaluated for VOC RACT per MEDEP Chapter 134. **No streamlining is required**

3. HAPs
   40 CFR, Part 63, Subpart S contains the only applicable HAP standard.
   No streamlining is required

J. Bleach Plant and Chlorine Dioxide Generation

In the chlorine dioxide generation process, sodium chlorate reacts with methanol in the presence of sulfuric acid to form chlorine dioxide and a spent acid stream containing formic acid and an acidic salt cake. The bleach plant uses chlorine dioxide as a bleaching agent. The typical bleaching sequence is $D_0E_{OP}D_1ED_2$. Elemental Chlorine has been eliminated from the bleaching process. Oxygen (O) and Peroxide (P) are supplements to the alkaline extraction stage (E).

Emissions from the Bleach Plant and Chlorine Dioxide Generation System are treated with a single packed bed scrubber. A tail gas scrubber pretreats some of the gas streams being fed to the bleach plant scrubber. Stack testing on the bleach plant scrubber may be conducted with the tail gas scrubber on or off line as described in Specific Condition 24(D). The Bleach Plant and Chlorine Dioxide Generation System are subject to MEDEP Chapter 122, and the Bleach Plant is subject to 40 CFR, Part 63, Subpart S.

Streamlining

1. Cl_2 and ClO_2
   MEDEP Chapter 122 contains applicable Cl_2 and ClO_2 lb/hr emission limits.
   No streamlining is required

2. VOC
   This source is subject to and has been evaluated for VOC RACT per MEDEP Chapter 134. **No streamlining is required**

3. HAPs
   40 CFR, Part 63, Subpart S contains applicable compliance options at 63.445 (c) for emissions of chlorinated HAPs. **No streamlining is required**

Periodic Monitoring

Domtar shall stack test the Bleach Plant/ClO_2 Generation System Scrubber every calendar year for Cl_2 and ClO_2 emissions in accordance with NCASI Method 520 for sampling chlorine and chlorine dioxide.

MACT CMS

40 CFR, Part 63, Subpart S contains an applicable requirement to operate a CMS for the Bleach Plant Scrubber. A letter dated February 23, 2001, requesting alternative monitoring from Subpart S was sent to, and approved by, the EPA by a letter dated March 14th, 2001. Therefore, the MACT CMS for the Bleach Plant Scrubber shall consist of the following:

Item to be monitored	Record	Average
Scrubber liquid influent recycle flow rate	Every 15 min	3 hr block avg every 3 hours
pH or ORP of the scrubber liquid	Every 15 min	3 hr block avg every 3 hours
Scrubber Fan On/Off	Every 3 hours	N/A

The CMS parameter range shall be determined or modified as necessary, according to the procedures as specified in 40 CFR, Part 63.453(n).

Control Equipment
Control equipment for the Bleach Plant/ClO_2 Generation System consists of a single packed bed scrubber.

K. Lime Kiln Slakers and Causticizers
Domtar operates two lime slakers (designated as small and large) and four causticizers. Green liquor and lime are fed to the slaker-causticizer assembly and converted into white liquor, which is used in the digester. Domtar uses the small slaker for backup purposes.

Particulate emissions from the large slaker are controlled by a dynamic fan type wet scrubber, which uses green liquor as a scrubbing medium. Particulate emissions from the small slaker are controlled with a scrubber using green liquor as a scrubbing medium.

Streamlining
PM and PM_{10}
MEDEP Chapter 105 contains the only applicable PM standard.
No streamlining is required

Periodic Monitoring
Periodic monitoring for the Lime Kiln Slaker Scrubber shall be the following:

Item to be monitored	Record
Scrubber media flow rate	Once per shift

Control Equipment
Particulate emissions from the Lime Kiln Slakers and Causticizers are controlled by a dynamic fan type wet scrubber which uses green liquor as a scrubbing medium.

L. Lime Kiln

The Lime Kiln is a rotary kiln unit fired with #6 fuel oil. The Lime Kiln has a nominal production capacity of 440 ton/day of calcium oxide (lime, CaO). The kiln has a nominal heat input capacity of 75 MMBtu/hr. The Lime Kiln is used to recover lime (CaO) from lime mud (a product of causticizing green liquor). Lime is then used in the chemical conversion of green liquor to white liquor.

The Lime Kiln was constructed in 1965, prior to September 24th, 1976, and is therefore not subject to the requirements of 40 CFR, Part 60, Subpart BB. The Lime Kiln is subject to the requirements of 40 CFR, Part 63, Subpart MM and MEDEP Chapter 124. In 1989, RACT emission limits were determined for the Lime Kiln in Air Emission License #A-215-71-B-A/R.

Particulate emissions from the Lime Kiln are controlled by a variable throat venturi scrubber and a Ceilcote crossflow scrubber. The Lime Kiln is equipped to continuously monitor and record venturi scrubber pressure drop, media flow rate, O_2, and TRS.

Streamlining

1. PM and PM_{10}
   a. Domtar accepts streamlining for the PM standards of MEDEP Chapter 105 and 40 CFR, Part 63, Subpart MM. The standard of Subpart MM is determined to be more stringent and is therefore the only PM concentration standard included in this license
   b. BPT established the only applicable PM and PM_{10} lb/hr emission limits. **No streamlining is required**

2. SO_2
   RACT establishes the only applicable SO_2 lb/hr emission limit. **No streamlining is required**

3. NO_X
   a. MEDEP Chapter 138, NO_X RACT, contains the only applicable NO_X ppm emission limit. **No streamlining is required**
   b. RACT establishes the only applicable NO_X lb/hr emission limit. **No streamlining is required**

4. CO
   BPT established the only applicable CO lb/hr emission limit. **No streamlining is required**

5. TRS
   MEDEP Chapter 124 contains the only applicable TRS ppm emission limit. **No streamlining is required**

6. VOC
   a. This source is subject to and has been evaluated for VOC RACT per MEDEP Chapter 134. **No streamlining is required**
   b. BPT established the only applicable VOC lb/hr emission limit. **No streamlining is required**

Periodic Monitoring

Periodic Monitoring shall consist of record keeping that includes fuel use records and fuel analysis records. Periodic monitoring for the Lime Kiln shall also consist of calculating the daily oil fired on a quarterly basis.

Domtar shall stack test the Lime Kiln every other calendar year for PM in accordance with 40 CFR, Part 60, Appendix A, Method 5 Domtar shall stack test the Lime Kiln every other calendar year for NO_X in accordance with 40 CFR, Part 60, Appendix A, Method 7E.

Based on best management practices and the type of fuel for which the Lime Kiln was designed, it is unlikely that the Lime Kiln will exceed the emission limits for CO and VOC. Therefore periodic monitoring by the source for these pollutants is not required. However, neither the EPA nor the State is precluded from requesting the Mill to perform testing, and may take enforcement action for any violations discovered.

MACT CMS

MACT, 40 CFR, Part 63, Subpart MM contains an applicable requirement to operate a CMS for the Lime Kiln Scrubbers. Domtar shall comply with the requirements of Subpart MM by the applicable deadline.

The MACT CMS for the Lime Kiln Scrubbers shall consist of the following in accordance with 40 CFR, Part 63, Subpart MM. The MACT CMS shall be installed, operational and data verified pursuant to 40 CFR Part 63.8(c)(3).

Items to be Monitored	**Record**	**Average**
Scrubber Pressure Drop	Every 15 min	3 hr block avg once every 3 hours
Scrubber media flow rate	Every 15 min	3 hr block avg once every 3 hours

The CMS parameter range shall be determined, or modified as necessary, according to the procedures as specified in 40 CFR Part 63.864(j).

CEMS

MEDEP Chapter 124 contains an applicable requirement to monitor TRS ppm emissions.

There are no COMS required to be operated for the Lime Kiln. Based on the above, Domtar shall operate a CEMS which provides data to calculate TRS ppm and O_2 ppm emission from the Lime Kiln.

Control Equipment

Particulate control equipment for the Lime Kiln consists of a variable throat venturi scrubber and a Ceilote crossflow scrubber.

M. Steam Stripper

The Steam Stripper was installed in September of 1999 in order to comply with 40 CFR, Part 63, Subpart S. Hot condensate from the stripper is sent to the "clean combined condensate tank" for reuse in the brown stock washing system. The stripper off-gases are burned in the #9 Power Boiler, or in the NCG Incinerator.

In 2003, a WATER9 Model was conducted on the Waste Water Treatment Plant (WWTP) to study the ability of the WWTP to remove HAPs from condensate streams that had bypassed the Steam Stripper from May 11 to June 9, 2002. The study supported Domtar's position that the WWTP was effective at removing HAPs when the Steam Stripper was bypassed. As a result, the environmental impact of bypassing the steam stripper was negligible.

The Steam Stripper is subject to the requirements of 40 CFR, Part 60, Subpart BB, as well as 40 CFR, Part 63, Subpart S.

Streamlining

1. VOC

   This source is subject to and has been evaluated for VOC RACT per MEDEP Chapter 134. **No streamlining is required**

2. HAPs

   40 CFR, Part 63, Subpart S contains applicable HAP standards for this source. **No streamlining is required**

MACT CMS

MACT, 40 CFR, Part 63, Subpart S contains an applicable requirement to operate a CMS for the Steam Stripper. The MACT CMS for the Steam Stripper shall consist of the following:

Items to be Monitored	**Record**	**Average**
Stripper Condensate Feed Rate	Every 15 min	3-hr block avg every three hours
Steam feed rate	Every 15 min	3-hr block avg every three hours
Stripper Condensate Feed Temperature	Every 15 min	3-hr block avg every three hours
Steam flow to Condensate flow ratio	Every 15 min	3-hr block avg every three hours

The CMS parameter range shall be determined, or modified as necessary, according to the procedures as specified in 40 CFR Part 63.864(j).

N. Bulk Handling System

Domtar operates three separate bulk handling systems: starch handling system (average of 12 ton/day), hot lime handling system (average of 440 ton/day), and fresh lime make-up system (average of 37 ton/day). Each system consists of enclosed conveyers, hopper and silos.

Emissions from each system consist primarily of PM. Each system is equipped with a baghouse to control particulate emissions. Also, the hot lime system is equipped with an alarm system for overfilling or other malfunctions while unloading.

O. Non-Condensable Gas (NCG) Incinerator

The NCG Incinerator is a Jettherm BK-6 single chamber propane or Natural Gas fired incinerator with a maximum operating capacity of 20 MMBtu/hr. It serves as a back-up incinerator to the #9 Power Boiler, which is the primary incinerator for NCGs and SOGs. For the proper incineration of TRS gases, the NCG incinerator shall operate at a temperature adequate to comply with 40 CFR, Part 63, Subpart S.

The NCG Incinerator is limited to 2637 hours per year of operation (12 month rolling total). The NCG Incinerator is subject to the requirements of 40 CFR, Part 63, Subparts A and S.

Streamlining

1. PM and PM_{10}
   a. MEDEP Chapter 103 contains the only applicable PM lb/MMBtu emission limit. **No streamlining is required**

b. BACT established the only applicable PM and PM_{10} lb/hr emission limits. [Air Emission License #A-215-71-AC-A.]
No streamlining is required

2. SO_2
BACT establishes the only applicable SO_2 lb/hr emission limits.
No streamlining is required

3. NO_X
BACT establishes the only applicable NO_X lb/hr emission limits.
No streamlining is required

4. CO
BACT establishes the only applicable CO lb/hr emission limits.
No streamlining is required

5. VOC
BACT establishes the only applicable VOC lb/hr emission limits.
No streamlining is required

Periodic Monitoring
Periodic Monitoring shall consist of record keeping which demonstrates the type of fuel used in the NCG Incinerator during operation.

Based on best management practices and the type of fuel used in the NCG Incinerator, it is unlikely that the NCG Incinerator will exceed the emission limits for PM, NO_X, SO_2, CO, or VOC. Therefore, Periodic Monitoring by the source for these pollutants is not required. However, neither the EPA nor the State is precluded from requesting the Mill to perform testing and may take enforcement action for any violations discovered.

MACT CMS
MACT, 40 CFR, Part 63, Subpart S contains an applicable requirement to operate a CMS for the NCG Incinerator. The MACT CMS for the NCG Incinerator shall consist of the following:

Item to be monitored	**Record**
Incinerator temperature	1 minute average

The CMS parameter range shall be determined, or modified as necessary, according to the procedures as specified in 40 CFR Part 63.864(j).

P. Chip Thickness Screening System

1. The rotary drum screen shall only operate when the chip thickness screening system is out of service.
2. Visible emissions from the primary/secondary cyclone system, located in the chip thickness screening building, shall not exceed 20% opacity on a six minute block average basis, except for no more than 1 (one), 6 (six) minute block average in a 1-hour period.

Q. Waste Water Treatment Plant (WWTP)

By Federal Regulation, Domtar is required to operate with a National (or State) Pollution Discharge Elimination System (NPDES or SPDES) permit. By maintaining a valid NPDES or SPDES permit, the Department previously determined that Domtar's WWTP is meeting VOC RACT.

R. Visibility

An assessment of visibility impacts was submitted in July, 1987. This analysis characterized potential impairment at 3 Class I areas, the northern and southern sections of the Moosehorn Wildlife Refuge and Roosevelt Campobello International Park. This analysis was conducted in accordance with the procedures contained in the EPA Workbook for Estimating Visibility Impairment (EPA-450/4-80-031, November, 1980). The level I analysis was sufficient to demonstrate the proposed mill configuration would pose no impairment to visibility at the Roosevelt Campobello International Park or the southern section of the Moosehorn. Domtar and the Federal Land Manager disagreed over whether modeling conducted by both parties demonstrated an adverse impact on visibility from the #3 Recovery Boiler in the Northern Section of the Moosehorn National Wildlife Refuge (MNWR). However, the Federal Land Manager and Domtar agreed that the #3 Recovery Boiler will not contribute to an adverse visibility impact on the Northern Section of the MNWR if the combined mill's NO_X emissions from the Lime Kiln, #3 Recovery Boiler, and the #9 Power Boiler are limited to: 371 lb/hr, 8904 lb/day and 1178 ton/yr.

S. Facility Emissions

Domtar's annual emissions, in TPY, based on a 12 month rolling total.

Total Allowable Annual Emission for the Facility
Tons/year
(used to calculate the annual license fee)

Equipment	PM	PM_{10}	SO_2	NO_X	CO	VOC	TRS
#9 Power Boiler	394	394	676	780	5008	130	-
#3 Recovery Boiler	189	189	1567	601	983	176	-
Smelt Dissolving Tank	50	50	-	-	-	-	13.6
Lime Kiln	87	87	35	175	1750	-	-
Package Boiler	56	56	9.9	5.6	1.4	0.06	-
NCG Incinerator	8.4	8.4	12.7	39.6	2.8	0.2	-
TOTALS	**784.4**	**784.4**	**2300.6**	**1178.0[a]**	**7745.2**	**306.3**	**13.6**

- Please note that the total NO_X limit for the mill is less than total allowable emissions from individual units. Domtar may emit up to each required limit for any one individual unit, provided that the total of all units does not exceed the mill wide total of 1178 ton/yr (on a 12 month rolling total).
- PM10 and CO are used in the calculation of the annual fee but are included for completeness.
- Emissions do not include insignificant activities and process units (e.g. paper machine, woodyard) which have no licensed emission limits.

III. AIR QUALITY ANALYSIS

Domtar previously submitted an ambient air quality analysis demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards (License #A-215-71-AC-A). An additional ambient air quality analysis is not required for this Initial Part 70 License.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this source:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License A-215-70-A-I pursuant to MEDEP Chapter 140 and the preconstruction permitting requirements of MEDEP Chapter 115 and subject to the standard and special conditions below.

All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to Domtar pursuant to the Department's preconstruction permitting requirements in Chapters 108 or 115 have been incorporated into this Part 70 license, except for such conditions that MEDEP has determined are obsolete, extraneous or otherwise environmentally insignificant, as explained in the findings of fact accompanying this permit. As such the conditions in this license supercede all previously issued air license conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in Chapter 115 for making such changes and pursuant to the applicable requirements in Chapter 140.

For each standard and special condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only**.

Standard Statements

(1) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both;

(2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege;

(3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable.

(4) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license;

(5) Notwithstanding any other provision in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement.

(6) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:

(a) Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or

(b) The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section or any Part 70 license shall alter or effect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to Section 114 of the CAA.

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in an application dated October 8th, 1999.

SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
#9 Power Boiler	40 CFR, Part 60, Subpart C, Ca, and Cb	Standards of Performance for Large Municipal Waste Combustors	The only waste burned is generated by the mill and is not considered municipal waste.
#9 Power Boiler	40 CFR, Part 60, Subpart E, Ea, and Eb	Standards of Performance for Incinerators	#9 Power Boiler's main function is not that of an incinerator.
#9 Power Boiler	40 CFR, Part 60, Subpart O	Standards of Performance for Sewage Treatment Plants	#9 Power Boiler's main function is not that of a municipal sewage incinerator.
#9 Power Boiler	40 CFR, Part 60, Subpart E	National Emission Standard for Mercury	This regulation was not intended to apply to multi-fuel boilers that burn sludge generated from the facilities WWTP.

#9 Power Boiler	MEDEP Chapter 104	Incinerator Particulate Emission Standard	#9 Power Boiler is classified by Chapter 100 as fuel-burning equipment, not as an incinerator, and is therefore not subject to Chapter 104.
#9 Power Boiler	MEDEP Chapter 117	Continuous Opacity Monitoring Requirement	#9 Power Boiler is equipped with an approved wet scrubber.
#9 Power Boiler	MEDEP Chapter 121	Emission testing of resource recovery facilities	#9 Power Boiler is not a resource recovery facility.
#9 Power boiler	MEDEP Chapter 134	VOC RACT	Boilers are exempt per section 1(C)(4)of Chapter 134.
#9 Power Boiler	MEDEP Chapter 135	Hexavalent Chromium Particulate Emission Standard	#9 Power Boiler does not burn fuels which contain a total aggregate chromium concentration of 0.05% (or 500 ppm) by weight, as cited of section 2 of Chapter 135.
#3 Recovery Boiler	MEDEP Chapter 134	VOC RACT	Boilers are exempt per section 1(C)(4)of Chapter 134.
#3 Recovery Boiler	40 CFR Part 60, Subpart Db	Standards of Performance for Steam Generating Units	#3 Recovery Boiler is not subject to the NO_X limits at Section 60.44b in Subpart Db, because it is limited to 10% annual capacity for oil.
Package Boiler	MEDEP Chapter 115 and 40 CFR, Part 51	PSD Licensing Requirements	Package Boiler has a licensed restriction of less than six weeks of operation per year.
Package Boiler	MEDEP Chapter 138	NO_X RACT	Package Boiler is limited by license to less than 10 ton/yr NO_X.
Pressure Diffusion System	40 CFR, Part 60, Subpart BB	Standards of Performance for Kraft Mills and TRS Control from Kraft Pulp Mills	Definition of brownstock washer systems excludes diffusion washer systems.
Lime Kiln	MEDEP Chapter 134	VOC RACT	Fuel burning equipment is exempt from Chapter 134.

#4 paper Machine	MEDEP Chapter 105	General Process Source Particulate Emission Standard	Paper machine does not emit measurable particulate matter.
#4 paper Machine	MEDEP Chapter 134	VOC RACT	Paper machines are specifically exempt from Chapter 134 according to section 1(C) (7).
#4 Paper Machine	40 CFR Part 63 Subpart JJJJ	NESHAP for paper coating	Size-presses are not subject to Subpart JJJJ
Pulp Dryer	MEDEP Chapter 105	General Process Source Particulate Emission Standard	Pulp Dryer does not emit measurable particulate matter.
Steam Stripper	MEDEP Chapter 115 and 40 CFR, Part 51, PSD applicability	PSD License Procedures	Steam Stripper project was licensed as a pollution control project.
NCG Incinerator	40 CFR, Part 60, Subparts C, Ca, Cb, E, Ea, and Eb	Standards of Performance for Municipal Waste Combustors and Incinerators	NCG Incinerator is not a municipal waste incinerator.
#6 Fuel Oil Storage System	40 CFR, Part 60, Subparts K and Ka	Standards of Performance for Petroleum Liquid and Volatile Organic Liquid Storage Vessels	#6 fuel oil is not a petroleum liquid as defined in 60.111a (b).
#6 Fuel oil Storage System	40 CFR, Part 60, Subpart Kb	Standards of Performance for Petroleum Liquid and Volatile Organic Liquid Storage Vessels	#6 fuel oil has a vapor pressure less than 3.5 KPa. (per 10/15/03 Federal Register Notice)
Low Sulfur #6 Fuel Oil Storage Tank	40 CFR, Part 60, Subparts K and Ka	Standards of Performance for Petroleum Liquid and Volatile Organic Liquid Storage Vessels	#6 fuel oil is not a petroleum liquid as defined in 60.111a (b).
Low Sulfur #6 Fuel Oil Storage Tank	40 CFR, Part 60, Subpart Kb	Standards of Performance for Petroleum Liquid and Volatile Organic Liquid Storage Vessels	#6 fuel oil has a vapor pressure less than 3.5 KPa. (per 10/15/03 Federal Register Notice)
Facility	40 CFR, Part 63, Subpart OO	NESHAP for tanks – level 1	Domtar does not own or operate any equipment subject to Subpart OO.

Facility	40 CFR, Part 63, Subpart PP	NESHAP for containers	Domtar does not own or operate any equipment subject to Subpart PP.
Facility	40 CFR, Part 63, Subpart QQ	NESHAP for Surface Impoundments	Domtar does not own or operate any equipment subject to Subpart QQ.
Facility	40 CFR, Part 63, Subpart RR	NESHAP for Individual Drain Systems	Domtar does not own or operate any equipment subject to Subpart RR.
Facility	40 CFR, Part 63, Subpart VV	NESHAP for Oil-Water Separators and Organic-Water Separators	Domtar does not own or operate any equipment subject to Subpart VV.

(7) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:

(a) Additional Applicable requirements under the CAA become applicable to a Part 70 major source with a remaining Part 70 license term of 3 or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to Chapter 140;

(b) Additional requirements (including excess emissions requirements) become applicable to a Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;

(c) The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 license; or

(d) The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.

(8) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading and other similar programs or processes for changes that are provided for in the Part 70 license.

Standard Conditions

(1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions and this license (Title 38 MRSA §347-C).

(2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 140.

(3) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request.
Enforceable by State-only

(4) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 MRSA §353.

(5) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions.
Enforceable by State-only

(6) The licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license

(7) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, the filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license.

(8) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:

(a) perform stack testing under circumstances representative of the facility's normal process and operating conditions:

(i) within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions;

(ii) to demonstrate compliance with the applicable emission standards; or

(iii)pursuant to any other requirement of this license to perform stack testing.

(b) install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and

(c) submit a written report to the Department within thirty (30) days from date of test completion.

Enforceable by State-only

(9) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates emissions in excess of the applicable standards, then:

(a) within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and

(b) the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and

(c) the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate

under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.
Enforceable by State-only

(10) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license.

a. The licensee shall notify the Commissioner within 48 hours of a violation of any emission standard and/or a malfunction or breakdown in any component part that causes a violation of any emission standard, and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;

b. The licensee shall submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component part causes a violation of any emission standard, together with any exemption requests.

Pursuant to 38 MRSA § 349(9), the Commissioner may exempt from civil penalty an air emission in excess of license limitations if the emission occurs during start-up or shutdown or results exclusively from an unavoidable malfunction entirely beyond the control of the licensee and the licensee has taken all reasonable steps to minimize or prevent any emission and takes corrective action as soon as possible. There may be no exemption if the malfunction is caused, entirely or in part, by poor maintenance, careless operation, poor design or any other reasonably preventable condition or preventable equipment breakdown. The burden of proof is on the licensee seeking the exemption under this subsection.

c. All other deviations shall be reported to the Department in the facility's semiannual report.

(11) Upon the written request of the Department, the licensee shall establish and maintain such records, make such reports, install, use, and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status.

(12) The licensee shall submit semiannual reports of any required periodic monitoring. All instances of deviations from Part 70 license requirements must be clearly

identified in such reports. All required reports must be certified by a responsible official.

(13) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequently if specified in the applicable requirement or by the Department. The compliance certification shall include the following:

(a) The identification of each term or condition of the Part 70 license that is the basis of the certification;

(b) The compliance status;

(c) Whether compliance was continuous or intermittent;

(d) The method(s) used for determining the compliance status of the source, currently and over the reporting period; and

(e) Such other facts as the Department may require to determine the compliance status of the source;

Special Conditions

(14) #9 Power Boiler [MEDEP Chapter 140, BPT]

A. Emissions from the #9 Power Boiler shall not exceed the following:

Pollutant	lb/MMBtu	Origin and Authority	Avg Time
PM	0.15	RACT, #A-215-71-B-A/R	-
SO_2	0.79	BPT	24 hr block
NO_X	0.40[1]	MEDEP Chapter 138, NO_X RACT	24 hr block

Pollutant	lb/hr	Origin and Authority	Avg Time
PM	93.8	BPT	-
PM_{10}	93.8	BPT, **Enforceable by State Only**	-
SO_2	420	BPT, #A-215-71-X-M **Enforceable by State Only**	3 hr block
NO_X	186[2]	BPT	24 hr block
CO	1192.4	BPT, #A-215-71-B-A/R, **Enforceable by State Only**	-
VOC	31.3	BPT, **Enforceable by State Only**	-

1. See Condition 14(U) regarding compliance and for an alternative to this limit by combining NO_X emissions with the #3 Recovery Boiler.
2. See Condition 16 for an alternative to this limit by combining NOx emissions with Recovery Boiler #3.

B. Except as set forth in Condition 14(C), #9 Power Boiler shall not exceed a heat input rate of 625 MMBtu/hr while firing a combination of "other fuel" and #6 fuel oil.
C. While the #3 recovery boiler is offline or in a period of startup or shutdown, and the kraft mill, and the pulp dryer are all operating, Condition 14B of this license is not in effect.
D. Domtar shall document the date and time when the #3 recovery boiler is offline or in a period of startup or shutdown, and the kraft mill, and the pulp dryer are all not operating.
E. Domtar shall have no sulfur restrictions on fuel oil for the #9 power boiler, provided that emissions do not exceed the licensed limit of 0.79 lb SO_2/MMBtu for a 24 hr block average.
F. Visible emissions from the #9 power boiler shall not exceed an opacity of 30% on a six minute block average, except for no more than two (2), six (6) minute block averages in a three hour period. [MEDEP Chapter 101]
G. Four hours of cold start-up or planned shut-down are exempt from opacity standards provided the Department determines that the boiler was operated in a manner consistent with good air pollution control device practices to minimize emissions during the cold start-up or planned shut-down. [MEDEP Chapter 101]
H. At least every 18 months, Domtar shall inspect the grates at the bottom of #9 power boiler. **Enforceable by State-only**
I. If the inspection shows that any of the #9 power boiler grates are defective, then the defective grate(s) shall be replaced before #9 power boiler resumes operation. **Enforceable by State-only**
J. Maintenance records for the #9 power boiler grate inspection and replacement shall be maintained on file at Domtar for review upon request, and included in Domtar's quarterly report for the quarter that the maintenance was conducted. **Enforceable by State-only**
K. Records of the #9 power boiler feed water heater up-time shall be maintained, available upon request, and included in Domtar's quarterly reports. **Enforceable by State-only**
L. Annually, Domtar shall have in-house personnel perform control parameter tuning on the #9 power boiler, and biennially shall have an outside consultant perform control parameter tuning on the #9 power boiler. **Enforceable by State-only**
M. At least once a week, appropriate personnel shall clean each of the six oil guns, which were used during the preceding week, according to a required cleaning procedure. **Enforceable by State-only**
N. Domtar shall maintain records of each oil gun cleaning, make records available upon request, and include these records in Domtar's quarterly reports. **Enforceable by State-only**
O. During each safety inspection for #9 power boiler, a specific detailed report shall be maintained describing the mechanical condition of each of the oil gun

burner assemblies. These reports shall determine which oil gun burner assemblies need to be replaced during the next outage. **Enforceable by State-only**

P. Records of oil gun inspection and repairs shall be maintained, made available upon request, and included in Domtar's quarterly reports for the quarter when the maintenance is conducted. **Enforceable by State-only**

Q. An annual detailed review of scrubber operation shall be conducted by an original equipment manufacturer (OEM) representative, or otherwise qualified personnel. Any recommendations that arise shall be reviewed and acted upon as practicable. **Enforceable by State-only**

R. Records of scrubber review and all repairs shall be maintained, available upon request, and included in Domtar's quarterly reports for the quarter when the annual review is conducted. **Enforceable by State-only**

S. Domtar shall operate, calibrate, and maintain NO_X, and SO_2 CEMS and an O_2 and stack flow monitor in accordance with 40 CFR, Part 60, Appendix B and the data recovery requirements of MEDEP Chapter 117.

T. The NO_X and SO_2 CEMS shall record data on a lb/hr basis. Domtar shall also record, on a daily basis, the total NO_X emissions in lb/day from the #9 power boiler, and on a monthly basis, the total NO_X emissions on a 12 month rolling total from the #9 power boiler. These emission rates shall be used to calculate the total NO_X emissions for Condition 17. [#A-215-71-B-A/R]

U. Domtar may demonstrate compliance with NO_X emission limits using an emissions averaging basis, with CEM data. The emissions averaging shall be calculated between the #9 Power Boiler and #3 Recovery Boiler on an equivalent lb/MMBtu or ppmv on a 24-hour daily block arithmetic basis. The emission averaging basis shall be calculated as follows:

- Calculate the surplus NOx from #3 Recovery Boiler by subtracting the # 3 Recovery Boiler actual NOx ppmdv corrected for O2 from Chapter 138 limit (164 ppm, dry basis corrected for O2);
- Convert surplus NOx from #3 Recovery Boiler from ppmv to lbs/hr;
- Convert surplus NOx from #3 Recovery Boiler from lbs/hr to lbs/MMBtu;
- Subtract surplus NOx from #3 Recovery Boiler (in lbs/MMBtu) from actual 24 hour average (lb/MMBtu) on #9 Power Boiler and compare this value with NOx RACT lb/MMBtu limit (0.4 lbs/MMBtu) to determine compliance.

This method can also be used if surplus NOx from #9 Power Boiler needs to be averaged with NOx emissions from #3 Recovery Boiler.

If a CEM is used to demonstrate compliance with NO_X emission limits, then periods of startup, shutdown, malfunction, and fuel switching are not included in the 24-hour average emission rates, provided that records are maintained to show

facility was operated to minimize emissions. [Chapter 138 Sec 3(O); #A-215-71-S-A]

V. Until the CMS for Subpart DDDDD is installed, operational and data verified pursuant to 40 CFR, Part 63.8(c)(3), periodic monitoring for the #9 Power Boiler shall consist of the following:

Periodic monitoring	**Record**	**Average**
Scrubber pressure drop	Every 15 min	3 hr avg every three hours
Scrubber media make-up flow rate	Every 15 min	3 hr avg every three hours
Scrubber media recycle flow rate	Every 15 min	3 hr avg every three hours

(15) #3 Recovery Boiler [#A-215-71-B-A/R]

The #3 Recovery Boiler shall comply with each of the following:

A. Emissions shall not exceed the following.

Pollutant	**gr/dscf corrected to 8% O_2**	**ppmv dry basis corrected to 8% O_2**	**lb/hr**
PM	0.021	-	40.68
PM_{10}	-	-	40.68
SO_2	-	150 (30 day rolling average)	373.04[1], (3 hour block average)
NO_X	-	80[2] (30 day rolling avg) 164[2] (24 hr block avg)	143.3[3] (24 hour block average)
CO	-	215 (30 day rolling avg)	235[3] (24 hr block average)
VOC	-	-	40.2 (based on appropriate EPA stack testing method) **(Enforceable by State only)**
TRS	-	5[4] (12 hr block average)	-

1. See Condition 15(F)(1) for an alternative to this limit.
2. See Condition 14(U) regarding compliance and for alternatives to these limits by averaging emissions with the #9 Power Boiler.
3. See Condition 16 for alternatives to these limits by averaging emissions with the #9 Power Boiler.
4. The first 2 (two) 12 (twelve)-hour block averages in a calendar quarter which exceed 5 ppm are not considered violations of Chapter 124 or this License.

B. The 30 day rolling average shall be calculated and updated for each calendar day the boiler operates, as described in 40 CFR, Part 60, Method 19 (equation 19-19).
C. The 3-hour block average shall be calculated in eight consecutive 3-hour blocks per day, beginning at midnight.
D. Domtar shall not exceed an annual oil capacity of 10% for the #3 Recovery Boiler. Therefore, Domtar shall be limited to 6,822,930 gal #6 fuel oil on a 12 month rolling total. Fuel use records shall be kept to demonstrate compliance with this limit. [40 CFR, Part 60, Subpart Db]
E. Domtar shall record CEMS data for SO_2 and NO_X on the #3 Recovery Boiler, on a lb/hr basis.
F. Domtar shall:
    1) Not exceed the SO_2 emission limit of 373.04 lb/hr on a 3-hour block average basis for the #3 recovery boiler, except for the 300 hours per calendar year (see Condition 18) when the SO_2 emissions cap for the #3 recovery boiler and the #9 power boiler is not in effect.
    2) Demonstrate compliance with the SO_2 limits in 40 CFR, Part 60, Subpart Db, for the #3 recovery boiler by either of the following:
        i) The use of low sulfur oil (no greater than 0.5% by weight), or
        ii) By means of SO_2 CEMS data and actual total heat input data to maintain a maximum emission rate of 0.5 lb/MMBtu from all fuel on a 30-day rolling average basis, regardless of the percent sulfur content. The hourly emission rate averages calculated from CEMS information and calculated heat input from fuel shall be used to calculate emission rate averages for 30, consecutive, steam generating days.
    3) If Domtar demonstrates compliance with SO_2 emission limits by using low sulfur fuel oil, as described in Condition 15(F)(2)(i), Domtar may demonstrate compliance on the basis of fuel supplier receipts, or Domtar may sample the fuel on a daily basis, and demonstrate that the oil contains 0.5% sulfur or less in an as-fired condition on a 30-day rolling average basis.
    4) If Domtar demonstrates compliance with SO_2 emission limits via SO_2 CEMS data, as described in Condition 15(F)(2)(ii), Domtar shall submit with the quarterly reports, SO_2 CEMS monitoring data and delivered total fuel heat content. The hourly emission rate averages calculated from CEM data, and the calculated MMBtu heat input from fuel shall be used to calculate emission rate averages for 30 consecutive steam generating days (e.g. 30-day rolling average). The actual 30-day average shall not exceed 0.50 lb SO_2/MMBtu for all fuels.
G. Domtar shall maintain records of the fuel analysis provided by the supplier.
H. Operation of the #3 recovery boiler with only one ESP chamber in operation shall not exceed the maximum firing rate established through EPA reference test method 5 at which 0.021 gr/dscf and 40.68 lb/hr of PM emissions shall

not be exceeded. As used in this Condition 15(H), the maximum boiler firing rate shall be 2.88 MM lbs. BLS/day when the north ESP chamber is not operational and 3.18 MM lbs. BLS/day when the south ESP chamber is not operational. Additional testing shall be conducted in 2005 to reestablish the maximum firing rates when an ESP field is down.

I. Domtar shall record hourly total NO_X emissions in lb/hr, shall record daily total NO_X emissions in lb/day, and shall record monthly (calendar month) the total NO_X emissions for the most recent 12 months for the #3 Recovery Boiler. This data shall be used to calculate the total facility NO_X emissions for Condition 17.

J. Domtar shall maintain records of startup, shutdown, and malfunction (SSM) for the #3 Recovery Boiler and maintain an SSM plan pursuant to 40 CFR, Part 63, Subpart MM.

K. Domtar shall operate a COMS to monitor opacity from the #3 Recovery Boiler pursuant to 40 CFR, Part 63, Subpart MM.

L. Periodic monitoring for the #3 Recovery Boiler shall consist of the following:

Items to be Monitored	**Record**
Black liquor firing rate	24-hr average

M. The #3 Recovery Boiler shall vent through a 275 ft AGL (Above Ground Level) stack.

N. The #3 Recovery Boiler is subject to 40 CFR, Part 60, Subparts A, BB, and Db, as well as 40 CFR, Part 63, Subparts A, S, and MM.

O. Domtar has chosen to comply with the opacity standard option in MEDEP Chapter 101, Section 2(B)(2)(a)(ii) for the #3 Recovery Boiler. By choosing this option, Domtar shall also be subject to the requirements of Chapter 101, Section 2(B)(2)(b) for the #3 Recovery Boiler.

(16) Combined lb/hr Emissions From #3 Recovery Boiler and #9 Power Boiler

A. When NO_X emissions from the #3 Recovery Boiler are greater than 143.3 lb/hr on a 24-hour average basis, a combined limit of 329.3 lb/hr on a 24-hour average for #3 Recovery Boiler and #9 Power Boiler shall apply. When NO_X emissions from #3 Recovery Boiler are greater than 143.3 lb/hr, an alternative limit of 170.3 lb/hr on a 24-hour average shall apply to the #3 Recovery Boiler, in addition to the 329.3 lb/hr combined total for both units. These alternative limits may not be used more than 60 times per year (12 month rolling total).

B. When NO_X emissions from #9 Power Boiler are greater than 186 lb/hr on a 24-hour average basis, the combined NO_X emissions from both units shall not exceed the total of 329.3 lb/hr on a 24-hour average basis. This alternative limit may not be used more than 5 times per year (12 month rolling total). During such periods, Domtar shall keep records detailing the use of these limits, including a 12 month rolling total. Domtar shall still

meet the BACT limits of 164 ppmv, on a dry basis, corrected to 8% O_2, on a 24-hour block average basis and 80 ppmv , corrected to 8% O_2, on a 30 day rolling average, for the #3 Recovery Boiler, except that it may utilize the Emissions Averaging allowed in Condition 14(U) to meet such ppmv limits.

C. A combined CO emission limit for #9 Power Boiler and #3 Recovery Boiler shall be in effect only when #9 Power Boiler is off-line. Combined CO emissions from #9 Power Boiler and #3 Recovery Boiler shall not exceed 1427.4 lb/hr on a 24-hour block average basis, for no more than seven, 24-hour block averages in any year (12 month rolling total). If #9 Power Boiler is off-line for less than a 24-hour period, then this period shall be time weighted to adjust the additional CO amount for the #3 Recovery Boiler 24-hour block average. [License #A-215-71-AC-A, A-215-71-AH-M]

(17) Domtar shall limit the mill-wide NO_X emissions to 371 lb/hr, 7800 lb/day, and 1178 ton/yr (based on a 12-month rolling total). No more than five times per year, Domtar may exceed the lb/hr limit of 371. During these instances, the mill-wide NOX emissions shall not exceed 450 lb/hr. Records shall be maintained to demonstrate compliance with these limits. [MEDEP Chapter 140, BPT]

(18) The combined total SO_2 emissions from the #3 recover boiler and the #9 power boiler shall not exceed 793.04 lb/hr (based on a 3-hour block average). This combined emissions cap shall be in effect for no more than 300 hours per calendar year. [MEDEP Chapter 140, BPT, #A-215-71-X-M]

(19) Smelt Dissolving Tank [MEDEP Chapter 140, BPT, #A-215-71-B-A/R, 40 CFR, Part 63, Subpart MM]

The smelt dissolving tank shall comply with each of the following:

A. Emissions from the smelt dissolving tank shall not exceed the following:

Pollutant		**lb/hr**
PM	0.127 lb/ton BLS (dry weight)	11.9
PM_{10}	-	11.9
SO_2	-	5.89
TRS	0.033 lb/ton BLS (dry weight)	3.1

B. The smelt dissolving tank shall vent through a 232 ft AGL stack.

C. Domtar shall operate the smelt dissolving tank scrubber when the smelt dissolving tank is in operation, and may not exceed the applicable emission limits set forth in MEDEP Chapter 124 and 40 CFR, Part 60, Subpart BB.

D. The smelt dissolving tank is subject to 40 CFR, Part 60, Subparts A and BB as well as 40 CFR, Part 63, Subparts A and MM.

E. Domtar shall operate a continuous monitoring system that can be used to determine and record the pressure drop across the scrubber and the scrubber

fluid flow rate at least once every successive 15-minute period in accordance with 40 CFR, Part 63.8(c).

F. The monitoring used for continuous measurement of the pressure drop of the gas stream across the scrubber must be certified by the manufacturer to be accurate within a gauge pressure of ±500 pascals (±2 inches of water gauge pressure).

G. The monitoring device used for continuous measurement of the scrubbing liquid flow rate must be certified by the manufacturer to be accurate within ±5 percent of the design scrubbing liquid flow rate.

(20) The Digester and Evaporator System shall comply with the following:

A. Domtar shall maintain and operate the TRS NCG collection system for the digester relief gases, exhaust gases from the blow tank, flash tank, condenser, and evaporator system to be incinerated in the #9 power boiler or the backup incinerator as required in MEDEP Chapter 124.

B. Domtar shall operate and maintain a designated backup incinerator in accordance with MEDEP Chapter 124.

C. The Digester and Evaporator System is subject to 40 CFR, Part 63, Subparts A and S.

(21) Brownstock Washer System [MEDEP Chapter 140, BPT, #A-215-71-AI-A]
The pressure diffusion washer system shall meet the control requirements of 40 CFR, Part 63, Subpart S by April 17, 2007. The Brownstock Washer System, including the Pressure Diffusion Washer System, shall meet the control requirements in Chapter 124 by April 17, 2007.

(22) Condensate Collection [MEDEP Chapter 140, BPT, 40 CFR, Part 63, Subpart S, MEDEP Chapter 124]
Domtar has elected to demonstrate compliance with the pulping condensate collection option listed in 40 CFR Part 63, §63.446(c)(3), which requires collection of pulping process condensates that contain a total HAP mass rate of 11.1 lb/ton of oven-dry pulp.

Domtar shall use a steam stripper to treat some of the pulping process condensate streams and send the captured HAP's to either the #9 Power Boiler or the NCG Incinerator in accordance with 40 C.F.R. § 63.446. The treatment of these condensate streams meets the requirements of 40 CFR, 63.446(e)(3), reducing or destroying the total HAPS by 92%, or 63.446(e)(5), removing 10.2 lb of HAPs per ton of oven-dry pulp, or achieving a total HAP concentration of 330 ppm or less at the outlet.

The steam stripper system is comprised of the steam stripper, foul condensate tank, and associated piping and ductwork.

A. Emissions from the steam stripper and foul condensate tank shall be collected and controlled by the #9 Power Boiler or the NCG incinerator for a minimum of 99% of the stripper's operating time on a quarterly basis. The Steam Stripper must have a minimum of 90% up-time pursuant to 40 CFR, 63.446(g). [MEDEP Chapter 124, 40 CFR, Part 63 Subpart S]

Domtar shall record the amount of time on a quarterly basis of:

1. stripper operation
2. the combustion of Stripper Off Gas (SOG) in the #9 Power Boiler
3. the combustion of SOGs in the NCG incinerator
4. any ventings of SOGs

Any venting of SOGs in portion or in whole shall be considered time of uncontrolled emissions, which shall not exceed the specified 1% above.

B. Domtar shall monitor and record the following as specified for the Steam stripper.

Item to be monitored	**Record**	**Average**
Stripper Condensate Feed Rate	Every 15 min	3-hr block avg every three hours
Steam feed rate	Every 15 min	3-hr block avg every three hours
Stripper Condensate Feed Temperature	Every 15 min	3-hr block avg every three hours
Steam flow to Condensate flow ratio	Every 15 min	3-hr block avg every three hours

C. The steam stripper system is subject to 40 CFR, Part 60, Subpart BB, and 40 CFR, Part 63, Subpart S.

(23) Non-Condensable Gas Incinerator [MEDEP Chapter 140, BPT, 40 CFR, Part 63, Subparts S and MM, MEDEP Chapter 124]

The Non-Condensable Gas (NCG) incinerator shall comply with each of the following:

A. The NCG incinerator shall serve as a backup incineration device to the #9 power boiler for the NCG system.

B. The NCG incinerator shall fire Propane or Natural Gas.

C. The NCG incinerator shall not operate more than 2637 hours per year (12 month rolling total).

D. The NCG incinerator shall maintain a minimum combustion temperature adequate to comply with the conditions of 40 CFR, Part 63, Subpart S.

E. In addition to Subpart S, the NCG Incinerator is subject to MEDEP Chapter 124.

F. Emissions from the NCG incinerator shall not exceed the following:

Pollutant	Lb/MMBtu	lb/hr
PM	0.20	3.9
PM_{10}	-	3.9
SO_2	-	5.9
[1]NO_X	-	18.4
CO	-	1.3
VOC	-	0.1

1. The NO_X emissions from the NCG incinerator shall be included in the mill-wide NO_X limit found in Condition 17.

G. The NO_X emissions shall be calculated by multiplying the hours of Incinerator operation with the above lb/hr NO_X emission limit.

H. Records of incinerator operation shall be maintained, and included in Domtar's quarterly reports.

I. Domtar shall monitor and record the following as specified for the NCG incinerator:

Item to be monitored	Record
Incinerator temperature	1 min average

(24) Bleach Plant/Chlorine Dioxide Generation System [MEDEP Chapter 140, BPT, MEDEP Chapter 122]

The Bleach Plant/Chlorine Dioxide Generation System shall comply with each of the following:

A. Total ClO_2 emissions shall not exceed 3.0 lb/hr. **Enforceable by State-Only**

B. Total Cl_2 emissions shall not exceed 3.0 lb/hr. **Enforceable by State-Only**

C. Annual compliance testing (calendar year basis) for Cl_2 and ClO_2 emission limits shall be conducted consistent with the MEDEP stack testing protocol guidelines. **Enforceable by State-Only**

D. For the Bleach plant scrubber, Domtar shall conduct annual compliance tests (calendar year basis) with the tail gas scrubber on-line. In addition, Domtar shall conduct annual compliance tests with the tail gas scrubber off-line if the mill has operated with the tail gas scrubber off-line since the last annual compliance test. Domtar may operate the Bleach Plant and ClO_2 Generation systems with the tail gas scrubber off-line if the previous testing has demonstrated compliance with the limit in Chapter 122 under the operating scenario. **Enforceable by State-Only**

E. If at any time, Domtar desires to use an alternate scrubbing media other than caustic or white liquor in either tower, Domtar shall conduct compliance tests within 60 days to demonstrate that the emission limits specified in this license are being met. The alternate media shall comply with MEDEP Chapter 122. **Enforceable by State-Only**

F. Periodic monitoring for the ClO_2 Plant Scrubber System shall consist of the following:

Items to be Monitored	Record	Average
Scrubber liquid influent recycle flow rate	Every 15 min	3 hr block avg every 3 hours
pH or ORP of the scrubber liquid	Every 15 min	3 hr block avg every 3 hours
Scrubber Fan On/Off	Every 3 hours	N/A

G. The Bleach Plant is subject to 40 CFR, Part 63, Subparts A and S.

(25) Lime Kiln Slakers and Causticizers [MEDEP Chapter 140, BPT]

The Lime Kiln Slakers and Causticizers shall comply with each of the following:

A. Domtar shall periodically monitor the media flow rate to the slaker scrubber and record once per shift in a permanent log.

B. For the small, backup slaker, Domtar shall operate a Ducon wetted fan scrubber on the slaker utilizing green liquor as the medium.

(26) Lime Kiln [MEDEP Chapter 140, BPT, #A-215-71-B-A/R]

The Lime Kiln shall comply with each of the following:

A. Emissions from the Lime Kiln shall not exceed the following:

Pollutant		lb/hr
PM	0.064 gr/dscf corrected to 10% O_2 based on EPA Method 5 stack testing.	20.8
PM_{10}	-	20.8
SO_2	-	8.3
NO_X	120 ppm (dry basis) corrected to 10% O_2 based on appropriate EPA Method 7 stack testing.	41.7
CO	-	417
VOC	-	1.5
TRS	20 ppm (dry basis) corrected to 10% O_2 on a 12 hour block average basis.	-

B. Domtar shall operate, calibrate, and maintain TRS and O_2 CEMS in accordance with MEDEP Chapter 117.

C. Domtar shall record hourly fuel firing rates to calculate and document hourly and daily NO_X emissions by a DEP approved method that corresponds to the required NO_X performance testing and submit the data in the quarterly reports. Until such a method is approved, use maximum hourly NO_X emissions as determined by stack testing to calculate and document hourly NO_X emissions. Domtar shall record hourly total lime kiln NO_X emissions in lb/hr, shall record daily total NO_X emissions in

lb/day, and shall record monthly (calendar month) the total NO_X emissions for the most recent 12 months. This shall be used to calculate total facility NO_X emissions.

D. The first four (4), twelve (12)-hour block averages in a quarter which exceed the TRS limits in Section 26(A) above are not violations of this License. [MEDEP Chapter 124]

E. Domtar shall not have restrictions in percent sulfur in fuel oil for the Lime Kiln, provided that emissions do not exceed 1.92 lb SO_2/MMBtu in any 24-hour period, as set forth in MEDEP Chapter 106, Section 4B. Domtar shall not be required to operate SO_2 CEMS on the Lime Kiln as set forth in MEDEP Chapter 117, Section 1F.

F. Domtar shall record CaO production rates in ton/day for the Lime Kiln.

G. Domtar shall operate a continuous monitoring system that can be used to determine and record the pressure drop across the scrubber and the scrubber fluid flow rate at least once every successive 15-minute period in accordance with 40 CFR, Part 63.8(c).

H. The monitoring used for continuous measurement of the pressure drop of the gas stream across the scrubber must be certified by the manufacturer to be accurate within a gauge pressure of ±500 pascals (±2 inches of water gauge pressure). [40 CFR, Part 63, Subpart MM]

I. The monitoring device used for continuous measurement of the scrubbing liquid flow rate must be certified by the manufacturer to be accurate within ±5 percent of the design scrubbing liquid flow rate. [40 CFR, Part 63, Subpart MM]

J. The Lime Kiln is subject to 40 CFR, Part 63, Subparts A and MM.

(27) Fresh Lime, Hot Lime, and Starch Bulk Handling Systems

The fresh lime and hot lime bulk handling systems and the starch silo system shall comply with each of the following:

A. Domtar shall clean up spills within 24 hours of occurrence of each spill or deposit. [MEDEP Chapter 140, BPT] **Enforceable by State Only**

B. Domtar shall inspect all unloading systems for leaks and malfunction once per shift. If leaks and/or malfunctions occur, Domtar shall discontinue unloading until leaks and/or malfunctions are eliminated. The inspection shall be recorded in a permanent log. [MEDEP Chapter 140, BPT]

C. Visible emissions for the Bulk Handling System baghouses shall not exceed 10% opacity on a six minute block average basis, except for no more than one, six-minute block average in a one-hour period. Domtar shall take corrective action if the visible emissions from the baghouses exceeds 5% opacity. [MEDEP Chapter 101]

(28) Portable Package Boiler [#A-215-71-E-A]

The Portable Package Boiler shall comply with each of the following:

A. The Portable Package Boiler shall not exceed 77.3 MMBtu/hr of #2 fuel oil with a sulfur content not to exceed 0.25% by weight. Domtar shall keep records of fuel use for the Portable Package Boiler, which shall consist of fuel supplier receipts, demonstrating percent sulfur content by weight.

B. The Portable Package Boiler shall not operate when the #9 Power Boiler is on-line. "On-line" is defined as producing steam at the design pressure of the boiler. Domtar shall maintain sufficient documentation to demonstrate compliance with this condition, including records documenting dates and times of operation for the Portable Package Boiler.

C. The Portable Package Boiler shall not operate for more than 6 weeks per calendar year. Domtar shall maintain sufficient documentation to demonstrate compliance with this condition.

D. Domtar shall maintain records of startup, shutdown, and malfunction for the Portable Package Boiler.

E. Emissions from the Portable Package Boiler shall not exceed the following:

Pollutant	lb/MMBtu	lb/hr
PM	0.08	1.1
PM_{10}	-	1.1
SO_2	-	19.6
NO_X	-	11.1
CO	-	2.8
VOC	-	0.1

F. Visible emissions shall not exceed 20% opacity based on six minute block average basis, except for no more than one (1) six (6) minute block average, not to exceed 27% opacity in a one hour period.

G. The Portable Package Boiler may be subject to 40 CFR, Part 60, Subparts A and Dc.

(29) Chip Thickness Screening System [MEDEP Chapter 140, BPT]

The Chip Thickness Screening System shall comply with each of the following:

A. The rotary drum screen shall only operate when the chip thickness screening system is out of service. Domtar shall keep a log of rotary drum screen operation.

B. Visible emission from the primary/secondary cyclone system, located in the chip thickness screening building, shall not exceed 20% opacity on a six minute block average basis, except for one, six-minute block average in any one-hour period. [MEDEP Chapter 101]

(30) Low Volume, High Concentration Collection and Control System

A. The digester and evaporator systems shall be vented to the LVHC system when the units are in use as specified in 40 CFR Part 63, Subpart S and Chapter 124 of the Department's regulations, with the #9 Power Boiler as the primary incineration unit and the NCG Incinerator as the back-up incineration unit. [40 CFR Part 63, Subpart S and MEDEP Chapter 124]

B. Pursuant to MEDEP Chapter 124, Domtar shall not allow venting of TRS from the LVHC or associated equipment that is required to be controlled which exceeds 40 minutes in duration or contributes to an aggregate TRS venting of more than 1% of quarterly operating time. Ventings within these parameters are not violations of this License. [MEDEP Chapter 124]

C. Pursuant to 40 CFR Part 63, Subpart S, Domtar shall operate the LVHC system as follows:

1. The LVHC system shall be enclosed and vented into a closed-vent system per 40 CFR Part 63, Subpart S, Sections 63.443 and 63.450.

2. Periods of excess emissions reported under 40 CFR Part 63, Subpart S, Section 63.455 shall not be a violation of Sections 63.443 (c) and (d), or this License, provided that at the time of excess emissions (excluding startup, shutdown, or malfunction) divided by the total process operating time in a semi-annual reporting period does not exceed the following levels: 1% for control devices used to reduce the total HAP emissions from the LVHC system and 4% for control devices used to reduce the total HAP emissions from both the LVHC and HVLC systems.

[40 CFR Part 63 Subpart S 63.433 (e)(3)]

D. Domtar shall comply with the applicable LVHC system recordkeeping and reporting requirements of 40 CFR Part 63, Subpart S and Chapter 124 of the Department's regulations. [40 CFR Part 63, Subpart S and MEDEP Chapter 124]

(31) High Volume Low Concentration Collection and Control System

A. Domtar shall operate an HVLC control and collection system for the brownstock washer systems, and, if required, knotters, and screens as required to meet Chapter 124 of the Department's regulations and 40 CFR Part 63, Subpart S. [Chapter 124 and 40 CFR Part 63, Subpart S]

B. Domtar shall collect and control TRS emissions greater than 0.75 lb/hr from the brownstock washer system per the requirements of Chapter 124 of the Department's regulations. [MEDEP Chapter 124]

C. Beginning April 17, 2007, the HVLC collection system shall maintain a 96% collection and control uptime based on quarterly brownstock washer system operating time. [MEDEP, Chapter 124 and 40 CFR Part 63, Subpart S]

D. Domtar shall comply with the applicable HVLC system recordkeeping and reporting requirements of 40 CFR Part 63, Subpart S and Chapter 124 of the Department's regulations. [40 CFR Part 63, Subpart S and MEDEP Chapter 124]

(32) Closed Collection and Vent System Monitoring

A. For equipment required to be inspected per 40 CFR Part 63, Subpart S, Sections 63.453(k) and (l), Domtar may exempt any closed vent system, fixed roof cover, or enclosure from 30-day and annual inspection, monitoring and repair requirements if it is determined that personnel performing the inspection of repair would be exposed to an imminent or potential danger, or the equipment could not be inspected without elevating the inspection personnel more than 6 feet above a supported surface. The site-specific monitoring plan must identify exempted equipment and describe how the equipment will be inspected and/or repaired during periods determined safe. [40 CFR Part 63, §63.453]

B. Domtar shall perform inspections in accordance with 40 CFR Part 63, Subpart S, Sections 63.453(k) and (l) once during each calendar month with at least 15 days elapsed time between inspections. [40 CFR Part 63, §63.453]

(33) Periodic Monitors [MEDEP Chapters 140]

A. The following Periodic Monitoring shall be recorded as specified by the applicable Special Conditions of this License. The records generated to demonstrate compliance may be from monitors, devices, calculations or other engineering methods which provide accurate and reliable data. If the periodic monitor allows the recording of accurate and reliable data less than 95% of the source operating time within any quarter of the calendar year, the Department may initiate enforcement action and may include in that enforcement action any period of time that the parameter monitor was not recording accurate and reliable data during that quarter unless the licensee can demonstrate to the satisfaction of the Department that the failure of the system to record accurate and reliable data was due to the performance of established quality assurance and quality control procedures or unavoidable malfunctions.

1. Scrubber pressure drop for the #9 Power Boiler
2. Scrubber media make-up flow for the #9 Power Boiler
3. Scrubber media recycle flow for the #9 Power Boiler
4. Fuel use and firing rate records for the Portable Package Boiler if operated
5. Scrubber flow rate for the Lime Kiln Slaker
6. Fuel firing rate for the Lime Kiln
7. Fuel use records for the #3 Recovery Boiler
8. Documentation that Domtar is maintaining a valid NPDES or SPDES permit
9. Solvent containing > 5% VOC added to each parts washer

B. Bleach Plant Monitors* [MEDEP Chapter 122, 40 CFR, Part 63, Subpart S]
The following periodic monitoring shall be recorded as specified by the applicable Special Conditions of this License, for the Bleach Plant. The Bleach plant monitors must record accurate and reliable data. If the periodic monitor allows the recording of accurate and reliable data less than 90% of the source operating time within any quarter of the calendar year, the Department may initiate enforcement action and may include in that enforcement action any period of time that the parameter monitor was not recording accurate and reliable data during that quarter unless the licensee can demonstrate to the satisfaction of the Department that the failure of the system to record accurate and reliable data was due to the performance of established quality assurance and quality control procedures or unavoidable malfunctions.

1. Scrubber recycle flow for the Bleach Plant/ClO_2 System
2. Scrubber pressure drop for the Bleach Plant/ClO_2 System
3. Scrubber ORP for the Bleach Plant/ClO_2 System
4. Scrubber Fan on/off setting for the Bleach Plant/ClO_2 System

*** may demonstrate compliance using only the Bleach Plant Scrubber**

(34) The following are identified as MACT Continuous Monitoring Systems (CMS)
1. The CMS required by 40 CFR, art 63, Subpart MM by the applicable deadline.
2. The CMS required by 40 CFR, Part 63, Subpart S.
3. The specific performance requirements for the CMS identified above are listed in 40 CFR, Part 63, Subpart A and the appropriate Subpart.

(35) CEMS, COMS and Periodic Monitors [MEDEP Chapter 140, BPT]

The CEMS, COMS, and periodic monitors required by this license shall be the primary means of demonstrating compliance with emission standards set by this Order, statute, state or federal regulation, as applicable. The licensee shall comply with the following:

A. **Performance Specifications** [MEDEP Chapter 117]

All CEMS and COMS shall meet the sampling and performance criteria specified in 40 CFR Part 51 Appendix P, and shall be operated in accordance with 40 CFR Part 60 Appendix F and Chapter 117 of the Departments regulations.

1. Conduct Relative Accuracy Testing (RATA) and/or Performance Audits in accordance with Chapter 117 of the Department's regulations.
2. Develop and maintain an updated quality assurance plan for all CEMS and COMS in accordance with 40 CFR Part 60 Appendix F and Chapter 117 of the Department's regulations.

B. **Recordkeeping** [MEDEP Chapter 117]

For all of the continuous emission monitoring (CEMS), continuous opacity monitor (COMS) required by this license, the licensee shall maintain records of the most current six year period and the records shall include:

a. Documentation that all CEMS and COMS are continuously accurate, reliable and operated in accordance with Chapter 117, 40 CFR Part 51, Appendix P, and 40 CFR Part 60, Appendices B and F. A CEM or COM shall allow the recording of accurate and reliable data sufficient to meet the data recovery thresholds in Section 5 of MEDEP Chapter 117.

b. Records of all measurements, performance evaluations, calibration checks, and maintenance or adjustments for each CEMS and COMS as required by 40 CFR Part 51 Appendix P.

C. **Quarterly Reporting** [MEDEP Chapter 117]

The licensee shall submit a Quarterly Report to the Bureau of Air Quality within 30 days after the end of each calendar quarter, detailing the following, for the control equipment, periodic monitors, Continuous Emission Monitoring Systems (CEMS) or Continuous Opacity Monitoring Systems (COMS) required by this license.

1. All control equipment downtimes and malfunctions;
2. All CEMS or COMS downtimes and malfunctions;
3. Sources (with CEMS/COMS) downtime report (#3 Recovery Boiler, #9 Power Boiler and Lime Kiln)

4. All CEM and COMS Quality Assurance Reports such as CGAs and Opacity Audit Report.
5. Production and Daily Oil Firing Rates Report, which includes the following information:
   - #3 Recovery Boiler daily average daily steam load (1000 # steam) black liquor solids fired per day and Oil flow (gallons per day)
   - #9 Power Boiler daily average daily steam load (1000 # steam) and Oil flow (gallons per day)
   - Digester Production (Air dried tons per day, ADTP)
   - Lime Kiln Production (tons of lime (CaO) produced per day)
6. Grate block inspection and change report for #9 Power Boiler (2nd quarter only)
7. #9 Power Boiler venturi scrubber inspection and maintenance report by OEM (2nd quarter only)
8. Oil gun cleaning report for # 9 Power Boiler
9. Feed water heater uptime for #9 Power Boiler
10. Prorated NOx Report (lb/MMBtu) for the #9 Power Boiler
11. NCGs/SOGs venting report with durations and sources
12. Incinerator running time for each month of the quarter (in hours)
14. Visibility Report – Conformance to millwide NOx **limit.**
15. SO2 CEMS data and delivered total fuel heat content as per Special Condition 15(F)(4).
16. All excess events of emission and operational limitations set by this Order, Statute, state or federal regulations, as appropriate. The following information shall be reported for each excess event;
    a. Standard exceeded;
    b. Date, time, and duration of excess event;
    c. Maximum and average values of the excess event, reported in the units of the applicable standard, and copies of pertinent strip charts and printouts when requested;
    d. A description of what caused the excess event;
    e. The strategy employed to minimize the excess event; and
    f. The strategy employed to prevent reoccurrence.
17. A report certifying there were no excess emissions, if that is the case.

(36) Stack Testing [MEDEP Chapter 140, BPT]
Domtar shall conduct stack testing in accordance with each of the following:

A. Conduct particulate emission testing and demonstrate compliance once every two calendar years, pursuant to Condition 8 of this License, on the following:
   1. #3 Recovery Boiler
   2. Lime Kiln
   3. Smelt Tank

B. Conduct particulate emission testing and demonstrate compliance every calendar year on the #9 Power Boiler. Once the requirements of 40 CFR, Part 63, Subpart DDDDD are in effect, the stack testing frequency may be reevaluated.
C. Conduct NO_X stack emission testing on Lime Kiln every even calendar year.
D. Conduct TRS stack emission testing and demonstrate compliance once every two calendar years on the Smelt Tank.
E. Conduct Cl2 and ClO2 stack testing on the Bleach Plant/ClO2 Generation System Scrubber every calendar year in accordance with NCASI Method 520 for sampling chlorine and chlorine dioxide.
F. Any stack testing performed shall use appropriate EPA test methods found in 40 CFR, Part 60, Appendix A.
G. Domtar may report all particulate matter emissions measured by EPA Method 5 as PM_{10}. Testing using EPA Method 201, 201A or 202 is not required.
H. VOC stack testing shall be conducted as requested by the Department using EPA Method 25A with results reported as carbon or propane.

(37) Parts Washers

Parts washers at Domtar are subject to MEDEP Chapter 130.

A. Domtar shall keep records of the amount of solvent containing >5% VOCs added to each parts washer. [MEDEP Chapter 140, BPT]
B. The following are exempt from the requirements of Chapter 130 [MEDEP Chapter 130]:
    1. Solvent cleaners using less than two liters (68 oz) of cleaning solvent with a vapor pressure of 1.00 mmHg, or less, at 20° C (68° F);
    2. Wipe cleaning; and,
    3. Cold cleaning machines using solvents containing less than or equal to 5% VOC by weight.
C. The following standards apply to remote reservoir cold cleaning machines that are applicable sources under Chapter 130.
    1. Domtar shall attach a permanent conspicuous label to each unit summarizing the following operational standards [MEDEP Chapter 130]:
        (i) Waste solvent shall be collected and stored in closed containers.
        (ii) Cleaned parts shall be drained of solvent directly back to the cold cleaning machine by tipping or rotating the part for at least 15 seconds or until dripping ceases, whichever is longer.
        (iii) Flushing of parts shall be performed with a solid solvent spray that is a solid fluid stream (not a fine, atomized or shower type spray) at a pressure that does not exceed 10 psig. Flushing shall be performed only within the freeboard area of the cold cleaning machine.
        (iv) The cold cleaning machine shall not be exposed to drafts greater than 40 meters per minute when the cover is open.
        (v) Sponges, fabric, wood, leather, paper products and other absorbent

materials shall not be cleaned in the degreaser.

(vi) When a pump-agitated solvent bath is used, the agitator shall be operated to produce no observable splashing of the solvent against the tank walls or the parts being cleaned. Air agitated solvent baths may not be used.

(vii) Spills during solvent transfer shall be cleaned immediately. Sorbent material shall be immediately stored in covered containers.

(viii) Work area fans shall not blow across the opening of the degreaser unit.

(ix) The solvent level shall not exceed the fill line.

2. The remote reservoir cold cleaning machine shall be equipped with a perforated drain with a diameter of not more than six inches. [MEDEP Chapter 130, BPT]

(38) Semiannual Reporting

The licensee shall submit semiannual reports every six months to the Bureau of Air Quality. The semiannual reports are due on July 31st and Jan 31st of each year with the initial semiannual report due January 31, 2005.

A. Each semiannual report shall include a summary of the periodic monitoring required by this license.

B. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.
[MEDEP Chapter 140]

(39) Annual Compliance Certification

Domtar shall submit an annual compliance certification to the Department in accordance with Standard Condition (13) of this license. The annual compliance certification is due January 31 of each year with the initial annual certification due Jan 31, 2005. Certification of compliance is to be based on the stack testing or monitoring data required by this license. Where the license does not require such data, or the license requires such data upon request of the Department and the Department has not requested the testing or monitoring, compliance may be certified based upon other reasonably available information such as the design of the equipment or applicable emission factors. [MEDEP Chapter 140]

(40) Submission of Reports

All reports and other documents required to be submitted to the Department shall be deemed submitted on the date postmarked or the date received by the Department, whichever is earlier. Reports shall be considered on-time if the postmark of the submittal is before the due date or if the report is received by the Department within seven calendar days of the due date. [MEDEP Chapter 140, BPT]

(41) A. Annual Emission Statement

In accordance with MEDEP Chapter 137, the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of:

1) A computer program and accompanying instructions supplied by the Department;

   or

2) A written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions should be directed to:

Attn: Criteria Emission Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017
Phone: (207) 287-2437

B. Toxic Air Pollutants Emission Statement

In accordance with MEDEP Chapter 137, the licensee shall submit the information necessary to accurately update the State's toxic air pollutants emission inventory by means of a written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions on the Air Toxics emissions inventory portion should be directed to:

Attn: Toxics Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017
Phone: (207) 287-2437

(42) The licensee is subject to the State regulations listed below.

Origin and Authority	Requirement Summary	Enforceability
Chapter 102	Open Burning	-
Chapter 109	Emergency Episode Regulation	-
Chapter 110	Ambient Air Quality Standard	-
Chapter 116	Prohibited Dispersion Techniques	-
38 M.R.S.A. §585-B, sub-§5	Mercury Emission Limit	Enforceable by State-only

(43) Units Containing Ozone Depleting Substances
When repairing or disposing of units containing ozone depleting substances, the licensee shall comply with the standards for recycling and emission reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioning units in Subpart B.
[40 CFR, Part 82, Subpart F]

(44) Asbestos Abatement
When undertaking Asbestos abatement activities, Domtar shall comply with the Standard for Asbestos Demolition and Renovation 40 CFR Part 61, Subpart M.

(45) The licensee is subject to all applicable requirements of 40 CFR Part 68 (Risk Management Plan).

(46) Operational Flexibility for Insignificant Units and Activities
Domtar may add or modify units and activities identified as "categorically exempt insignificant units and activities" under Appendix B of MEDEP Chapter 140. Domtar shall provide notice to the Department within 30 days of such addition or modification. Addition or modification of such units or activities does not require an amendment to this License.

(47) Certification by a Responsible Official
Semiannual reports, and annual compliance certifications required by this license to be submitted to the Bureau of Air Quality must be signed by a responsible official. [MEDEP Chapter 140]

(48) Domtar shall pay the annual air emission license fee within 30 days of **April 30th** of each year. Pursuant to Title 38-353-A, failure to pay this annual fee in the stated timeframe is sufficient grounds for revocation of the license under section 341-D, subsection 3.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2004.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAWN R. GALLAGHER, COMMISSIONER

The term of this license shall be five (5) years from the signature date above.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 3/16/1998
Date of application acceptance: 3/18/1998

Date filed with the Board of Environmental Protection _____

This Order prepared by Jonathan Voisine, Bureau of Air Quality.